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**CHRISTOPHER E. CHALSEN, ESQ.**  
**MICHAEL M. MURRAY, ESQ.**  
**LAWRENCE T. KASS, ESQ.**  
**MILBANK, TWEED, HADLEY & MCCLOY LLP**  
1 Chase Manhattan Plaza  
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Telephone: (212) 530-5000

*Attorneys for Defendant*  
FUJITSU MICROELECTRONICS AMERICA, INC.

**FILED**

DISTRICT COURT OF GUAM

DEC - 4 2006 *nba*

**MARY L.M. MORAN**  
**CLERK OF COURT**

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF GUAM

NANYA TECHNOLOGY CORP. and  
NANYA TECHNOLOGY CORP. U.S.A.,

Plaintiff,

vs.

FUJITSU LIMITED, FUJITSU  
MICROELECTRONICS AMERICA, INC.,

Defendants.

CIVIL CASE NO. 06-CV-00025

**NOTICE OF FILING OF ORIGINALS**

**ORIGINAL**

PLEASE TAKE NOTICE that Defendant Fujitsu Microelectronics America, Inc. ("FMA") files concurrently herewith originals described below. A portable document format ("pdf") copy of these documents was previously filed with this Court on November 20, 2006.

- 1) Application for Admission *Pro Hac Vice* of Frank A. Bruno
- 2) Declaration of Frank A. Bruno in Support of Application for Admission *Pro Hac Vice*
- 3) Application for Admission *Pro Hac Vice* of Christopher E. Chalsen
- 4) Declaration of Christopher E. Chalsen in Support of Application for Admission *Pro Hac Vice*
- 5) Application for Admission *Pro Hac Vice* of Chris L. Holm
- 6) Declaration of Chris L. Holm in Support of Application for Admission *Pro Hac Vice*
- 7) Application for Admission *Pro Hac Vice* of Lawrence T. Kass
- 8) Declaration of Lawrence T. Kass in Support of Application for Admission *Pro Hac Vice*
- 9) Application for Admission *Pro Hac Vice* of Michael M. Murray
- 10) Declaration of Michael M. Murray in Support of Application for Admission *Pro Hac Vice*

Respectfully submitted this 30<sup>th</sup> day of November, 2006.

**CALVO & CLARK, LLP**  
**MILBANK, TWEED, HADLEY**  
**& MCCLOY LLP**  
*Attorneys for Defendant*  
Fujitsu Microelectronics America, Inc.

By:   
**RODNEY J. JACOB**

Christopher E. Chalsen, New York Bar No. 1916485  
(*Seeking Admission Pro Hac Vice*)  
Michael M. Murray, New York Bar No. 2711265  
(*Seeking Admission Pro Hac Vice*)  
Lawrence T. Kass, New York Bar No. 2711265  
(*Seeking Admission Pro Hac Vice*)  
Frank A. Bruno, New York Bar No. 3028032  
(*Seeking Admission Pro Hac Vice*)  
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(671) 646-9355

Attorneys for Defendant  
Fujitsu Microelectronics America, Inc.

IN THE UNITED STATES DISTRICT COURT OF GUAM  
FOR THE TERRITORY OF GUAM

NANYA TECHNOLOGY CORP.,

Plaintiff,

vs.

FUJITSU LIMITED, et al.,

Defendants.

CIVIL CASE NO. 06-CV-00025

**APPLICATION FOR ADMISSION *PRO*  
*HAC VICE OF FRANK A. BRUNO***

NOW COMES Frank A. Bruno of the New York, New York firm Milbank, Tweed, Hadley & McCloy LLP and makes application under GR 17.1(d) for admission *pro hac vice*, having been retained by Defendant Fujitsu Microelectronics America, Inc., a California

corporation (“FMA”) to defend its interests in the above-captioned litigation, and would respectfully show unto the Court as follows:

**I.**

Frank A. Bruno is not a resident of Guam.

**II.**

Frank A. Bruno is not regularly employed in Guam.

**III.**

Frank A. Bruno is not regularly engaged in business or other activities in Guam.

**IV.**

Frank A. Bruno resides at 102 E. 22<sup>nd</sup> Street, Apt. 8C, New York, NY 10010, and practices as a principal attorney with Milbank, Tweed, Hadley & McCloy, LLP, at 1 Chase Manhattan Plaza, New York, New York 10005. His office telephone number (212) 530-5000 and facsimile number is (212) 530-5219.

**V.**

Frank A. Bruno was admitted and is an active member in good standing of the bar of the Eastern and Southern Districts of New York being admitted in 2000, State of New Jersey being admitted in 1999 (inactive bar no. 02194-1999), and State of New York being admitted in 2000 and an active member in good standing of a United States Court or of the highest court of another State or the District of Columbia.

**VI.**

Frank A. Bruno is not currently suspended or disbarred in any court, nor has he ever been.

**VII.**

Frank A. Bruno has been retained by FMA to represent FMA herein.

**VII.**

Frank A. Bruno has never sought *pro hac vice* admission to this District.

**IX.**

Frank A. Bruno has designated Rodney J. Jacob, of Calvo & Clark LLP, as local counsel, under GR 17.1(d)(2)(E) and (e). Mr. Jacob is an active member in good standing of the bar of this Court. Mr. Jacob has consented to this designation *infra*.

**X.**

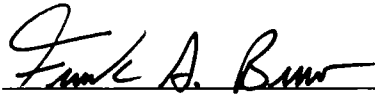
No waiver of any jurisdictional or venue challenge that may be made by FMA is intended by this application.

**XI.**

All facts asserted herein are attested to by Frank A. Bruno, in the accompanying Declaration.

WHEREFORE, PREMISES CONSIDERED, Frank A. Bruno, of Milbank, Tweed, Hadley & McCloy LLP, applies for admission *pro hac vice*, to serve as lead counsel for FMA, through and including trial and/or judgment herein.

Dated: November 16, 2006



CHRISTOPHER E. CHALSEN

New York Bar No. 1916485

(Seeking admission *Pro Hac Vice*)

MICHAEL M. MURRAY

New York Bar No. 2711265

(Seeking Admission *Pro Hac Vice*)

LAWRENCE T. KASS

New York Bar No. 2711265

(Seeking Admission *Pro Hac Vice*)

FRANK A. BRUNO

New York Bar No. 3028032

(Seeking Admission *Pro Hac Vice*)

MILBANK, TWEED, HADLEY

& McCLOY LLP

1 Chase Manhattan Plaza

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Rodney J. Jacob

Kathleen V. Fisher

Daniel M. Benjamin

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Tamuning, Guam 96913

(671) 646-9355

Attorneys for Defendant

Fujitsu Microelectronics America, Inc.

Christopher E. Chalsen, New York Bar No. 1916485  
(*Seeking Admission Pro Hac Vice*)  
Michael M. Murray, New York Bar No. 2711265  
(*Seeking Admission Pro Hac Vice*)  
Lawrence T. Kass, New York Bar No. 2711265  
(*Seeking Admission Pro Hac Vice*)  
Frank A. Bruno, New York Bar No. 3028032  
(*Seeking Admission Pro Hac Vice*)  
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Kathleen V. Fisher  
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(671) 646-9355

Attorneys for Defendant  
Fujitsu Microelectronics America, Inc.

IN THE UNITED STATES DISTRICT COURT OF GUAM

FOR THE TERRITORY OF GUAM

NANYA TECHNOLOGY CORP.,

Plaintiff,

vs.

FUJITSU LIMITED, et al.,

Defendants.

CIVIL CASE NO. 06-CV-00025

**DECLARATION OF FRANK A.  
BRUNO IN SUPPORT OF  
APPLICATION FOR ADMISSION *PRO  
HAC VICE***

FRANK A. BRUNO declare under penalty of perjury that the following statements are true and correct:

1. I have personal knowledge of the facts stated in this declaration except as otherwise indicated.

2. I make this declaration in support of my application for admission *pro hac vice* pursuant to GR 17.1(d), having been retained by Defendant Fujitsu Microelectronics America, Inc. ("Fujitsu MA"), to defend its interests in the above-captioned litigation.

3. I am an active member in good standing of the bar of the Eastern and Southern Districts of New York being admitted in 2000, State of New Jersey being admitted in 1999 (inactive bar no. 02194-1999), and State of New York being admitted in 2000.

4. I am an active member in good standing of a United States Court or of the highest court of another State or the District of Columbia, as indicated above.

5. I agree to abide by the Standards of Professional Conduct, Electronic Case Filing, and to become familiar with the Local Rules and the Alternative Dispute Resolution programs of this Court; and

6. An attorney who is a member of the bar of this Court in good standing and who maintains an office within Guam has been designated co-counsel in the above entitled action.

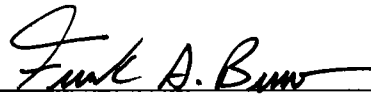
The name, address and telephone number of that attorney is:

Rodney J. Jacob  
Kathleen V. Fisher  
Daniel M. Benjamin  
Calvo & Clark LLP  
655 South Marine Corp Drive  
Suite 202  
Tamuning, Guam 96913  
(671) 646-9355

I declare under penalty of perjury that the foregoing is true and correct.



DATED: New York, New York, November 16, 2006.

  
\_\_\_\_\_  
FRANK A. BRUNO

Christopher E. Chalsen, New York Bar No. 1916485

*(Seeking Admission Pro Hac Vice)*

Michael M. Murray, New York Bar No. 2711265

*(Seeking Admission Pro Hac Vice)*

Lawrence T. Kass, New York Bar No. 2711265

*(Seeking Admission Pro Hac Vice)*

Frank A. Bruno, New York Bar No. 3028032

*(Seeking Admission Pro Hac Vice)*

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Tel. No. 212.530-5000

Rodney J. Jacob

Kathleen V. Fisher

Daniel M. Benjamin

Calvo & Clark LLP

655 South Marine Corp Drive

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Tamuning, Guam 96913

(671) 646-9355

Attorneys for Defendant

Fujitsu Microelectronics America, Inc.

IN THE UNITED STATES DISTRICT COURT OF GUAM

FOR THE TERRITORY OF GUAM

NANYA TECHNOLOGY CORP.,

Plaintiff,

vs.

FUJITSU LIMITED, et al.,

Defendants.

CIVIL CASE NO. 06-CV-00025

**APPLICATION FOR ADMISSION *PRO*  
*HAC VICE OF CHRISTOPHER E.*  
*CHALSEN***

NOW COMES Christopher E. Chalsen of the New York, New York firm Milbank, Tweed, Hadley & McCloy LLP and makes application under GR 17.1(d) for admission *pro hac vice*, having been retained by Defendant Fujitsu Microelectronics America, Inc., a California

corporation (“FMA”) to defend its interests in the above-captioned litigation, and would respectfully show unto the Court as follows:

**I.**

Christopher E. Chalsen is not a resident of Guam.

**II.**

Christopher E. Chalsen is not regularly employed in Guam.

**III.**

Christopher E. Chalsen is not regularly engaged in business or other activities in Guam.

**IV.**

Christopher E. Chalsen resides at 1 Peach Tree Lane, Briarcliff Manor, NY 10510, and practices as a principal attorney with Milbank, Tweed, Hadley & McCloy, LLP, at 1 Chase Manhattan Plaza, New York, New York 10005. His office telephone number (212) 530-5000 and facsimile number is (212) 530-5219.

**V.**

Christopher E. Chalsen was admitted and is an active member in good standing of the bar of the Federal Circuit Court of Appeals being admitted on 01/01/1985, Eastern District of New York being admitted on 06/05/1984, Southern District of New York being admitted on 6/05/1984, and New York, First Department being admitted on 04/16/1984 and an active member in good standing of a United States Court or of the highest court of another State or the District of Columbia.

**VI.**

Christopher E. Chalsen is not currently suspended or disbarred in any court, nor has he ever been.

**VII.**

Christopher E. Chalsen has been retained by FMA to represent FMA herein.

**VII.**

Christopher E. Chalsen has never sought *pro hac vice* admission to this District.

**IX.**

Christopher E. Chalsen has designated Rodney J. Jacob, of Calvo & Clark LLP, as local counsel, under GR 17.1(d)(2)(E) and (e). Mr. Jacob is an active member in good standing of the bar of this Court. Mr. Jacob has consented to this designation *infra*.

**X.**

No waiver of any jurisdictional or venue challenge that may be made by FMA is intended by this application.

**XI.**

All facts asserted herein are attested to by Christopher E. Chalsen, in the accompanying Declaration.

WHEREFORE, PREMISES CONSIDERED, Christopher E. Chalsen, of Milbank, Tweed, Hadley & McCloy LLP, applies for admission *pro hac vice*, to serve as lead counsel for FMA, through and including trial and/or judgment herein.

Dated: November 15, 2006



---

CHRISTOPHER E. CHALSEN  
New York Bar No. 1916485  
(Seeking admission *Pro Hac Vice*)  
MICHAEL M. MURRAY  
New York Bar No. 2711265  
(Seeking Admission *Pro Hac Vice*)  
LAWRENCE T. KASS  
New York Bar No. 2711265  
(Seeking Admission *Pro Hac Vice*)  
FRANK A. BRUNO  
New York Bar No. 3028032  
(Seeking Admission *Pro Hac Vice*)  
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& McCLOY LLP  
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Attorneys for Defendant  
Fujitsu Microelectronics America, Inc.

Christopher E. Chalsen, New York Bar No. 1916485  
(*Seeking Admission Pro Hac Vice*)  
Michael M. Murray, New York Bar No. 2711265  
(*Seeking Admission Pro Hac Vice*)  
Lawrence T. Kass, New York Bar No. 2711265  
(*Seeking Admission Pro Hac Vice*)  
Frank A. Bruno, New York Bar No. 3028032  
(*Seeking Admission Pro Hac Vice*)  
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Attorneys for Defendant  
Fujitsu Microelectronics America, Inc.

IN THE UNITED STATES DISTRICT COURT OF GUAM  
FOR THE TERRITORY OF GUAM

NANYA TECHNOLOGY CORP.,

Plaintiff,

vs.

FUJITSU LIMITED, et al.,

Defendants.

CIVIL CASE NO. 06-CV-00025

**DECLARATION OF CHRISTOPHER  
E. CHALSEN IN SUPPORT OF  
APPLICATION FOR ADMISSION *PRO  
HAC VICE***

CHRISTOPHER E. CHALSEN declare under penalty of perjury that the following  
statements are true and correct:

1. I have personal knowledge of the facts stated in this declaration except as otherwise indicated.

2. I make this declaration in support of my application for admission *pro hac vice* pursuant to GR 17.1(d), having been retained by Defendant Fujitsu Microelectronics America, Inc. ("FMA"), to defend its interests in the above-captioned litigation.

3. I am an active member in good standing of the bar of the Federal Circuit Court of Appeals being admitted on 01/01/1985, Eastern District of New York being admitted on 06/05/1984, Southern District of New York being admitted on 06/05/1984, and New York, First Department being admitted on 04/16/1984.

4. I am an active member in good standing of a United States Court or of the highest court of another State or the District of Columbia, as indicated above.

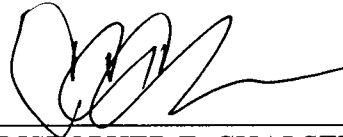
5. I agree to abide by the Standards of Professional Conduct, Electronic Case Filing, and to become familiar with the Local Rules and the Alternative Dispute Resolution programs of this Court; and

6. An attorney who is a member of the bar of this Court in good standing and who maintains an office within Guam has been designated co-counsel in the above entitled action. The name, address and telephone number of that attorney is:

Rodney J. Jacob  
Kathleen V. Fisher  
Daniel M. Benjamin  
Calvo & Clark LLP  
655 South Marine Corp Drive  
Suite 202  
Tamuning, Guam 96913  
(671) 646-9355

I declare under penalty of perjury that the foregoing is true and correct.

DATED: New York, New York, November 15, 2006.

A handwritten signature in black ink, appearing to read 'C. Chalsen', is written above a horizontal line.

CHRISTOPHER E. CHALSEN



Christopher E. Chalsen, New York Bar No. 1916485  
(*Seeking Admission Pro Hac Vice*)  
Michael M. Murray, New York Bar No. 2711265  
(*Seeking Admission Pro Hac Vice*)  
Lawrence T. Kass, New York Bar No. 2733079  
(*Seeking Admission Pro Hac Vice*)  
Frank A. Bruno, New York Bar No. 3028032  
(*Seeking Admission Pro Hac Vice*)  
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Attorneys for Defendant  
Fujitsu Microelectronics America, Inc.

IN THE UNITED STATES DISTRICT COURT OF GUAM  
FOR THE TERRITORY OF GUAM

NANYA TECHNOLOGY CORP.,

Plaintiff,

vs.

FUJITSU LIMITED, et al.,

Defendants.

CIVIL CASE NO. 06-CV-00025

**APPLICATION FOR ADMISSION *PRO*  
*HAC VICE OF CHRIS L. HOLM***

NOW COMES Chris L. Holm of the Los Angeles, California firm Milbank, Tweed, Hadley & McCloy LLP and makes application under GR 17.1(d) for admission *pro hac vice*, having been retained by Defendant Fujitsu Microelectronics America, Inc., a California

corporation (“FMA”) to defend its interests in the above-captioned litigation, and would respectfully show unto the Court as follows:

**I.**

Chris L. Holm is not a resident of Guam.

**II.**

Chris L. Holm is not regularly employed in Guam.

**III.**

Chris L. Holm is not regularly engaged in business or other activities in Guam.

**IV.**

Chris L. Holm resides at 714 Palisades Dr., Pacific Palisades, CA 90272 and practices as a principal attorney with Milbank, Tweed, Hadley & McCloy, LLP, at 601 South Figueroa St., Los Angeles, California 90017. His office telephone number is (213) 892-4000 and facsimile number is (212) 629-5219-5219.

**V.**

Chris L. Holm was admitted and is an active member in good standing of the bar of the U.S. Court of Appeals for the Federal Circuit being admitted on January 28, 2000, U.S. District Court for the Southern District of New York being admitted on December 28, 1999, U.S. District Court for the Eastern District of New York being admitted on December 28, 1999, U.S. District Court for the District of Colorado being admitted on January 25, 2001, and State of New York being admitted on March 2, 1998, and as such is an active member in good standing of a United States Court or of the highest court of another State or the District of Columbia.

**VI.**

Chris L. Holm is not currently suspended or disbarred in any court, nor has he ever been.

**VII.**

Chris L. Holm has been retained by FMA to represent FMA herein.

**VII.**

Chris L. Holm has never sought *pro hac vice* admission to this District.

**IX.**

Chris L. Holm has designated Rodney J. Jacob, of Calvo & Clark LLP, as local counsel, under GR 17.1(d)(2)(E) and (e). Mr. Jacob is an active member in good standing of the bar of this Court. Mr. Jacob has consented to this designation *infra*.

**X.**

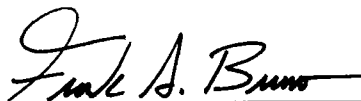
No waiver of any jurisdictional or venue challenge that may be made by FMA is intended by this application.

**XI.**

All facts asserted herein are attested to by Chris L. Holm, in the accompanying Declaration.

WHEREFORE, PREMISES CONSIDERED, Chris L. Holm, of Milbank, Tweed, Hadley & McCloy LLP, applies for admission *pro hac vice*, to serve as lead counsel for FMA, through and including trial and/or judgment herein.

Dated: November 16, 2006



---

CHRISTOPHER E. CHALSEN

New York Bar No. 1916485

(Seeking admission *Pro Hac Vice*)

MICHAEL M. MURRAY

New York Bar No. 2711265

(Seeking Admission *Pro Hac Vice*)

LAWRENCE T. KASS

New York Bar No. 2711265

(Seeking Admission *Pro Hac Vice*)

FRANK A. BRUNO

New York Bar No. 3028032

(Seeking Admission *Pro Hac Vice*)

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Rodney J. Jacob

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Daniel M. Benjamin

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655 South Marine Corp Drive

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(671) 646-9355

Attorneys for Defendant

Fujitsu Microelectronics America, Inc.

Christopher E. Chalsen, New York Bar No. 1916485  
(*Seeking Admission Pro Hac Vice*)  
Michael M. Murray, New York Bar No. 2711265  
(*Seeking Admission Pro Hac Vice*)  
Lawrence T. Kass, New York Bar No. 2733079  
(*Seeking Admission Pro Hac Vice*)  
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(671) 646-9355

Attorneys for Defendant  
Fujitsu Microelectronics America, Inc.

IN THE UNITED STATES DISTRICT COURT OF GUAM  
FOR THE TERRITORY OF GUAM

NANYA TECHNOLOGY CORP.,

Plaintiff,

vs.

FUJITSU LIMITED, et al.,

Defendants.

CIVIL CASE NO. 06-CV-00025

**DECLARATION OF CHRIS L. HOLM  
IN SUPPORT OF APPLICATION FOR  
ADMISSION *PRO HAC VICE***

CHRIS L. HOLM declares under penalty of perjury that the following statements are true  
and correct:

1. I have personal knowledge of the facts stated in this declaration except as otherwise indicated.

2. I make this declaration in support of my application for admission *pro hac vice* pursuant to GR 17.1(d), having been retained by Defendant Fujitsu Microelectronics America, Inc. ("Fujitsu MA"), to defend its interests in the above-captioned litigation.

3. I am an active member in good standing of the bar of the U.S. Court of Appeals for the Federal Circuit being admitted on January 28, 2000, U.S. District Court for the Southern District of New York being admitted on December 28, 1999, U.S. District Court for the Eastern District of New York being admitted on December 28, 1999, U.S. District Court for the District of Colorado being admitted on January 25, 2001, and State of New York being admitted on March 2, 1998.

4. I am an active member in good standing of a United States Court or of the highest court of another State or the District of Columbia, as indicated above.

5. I agree to abide by the Standards of Professional Conduct, Electronic Case Filing, and to become familiar with the Local Rules and the Alternative Dispute Resolution programs of this Court; and

6. An attorney who is a member of the bar of this Court in good standing and who maintains an office within Guam has been designated co-counsel in the above entitled action.

The name, address and telephone number of that attorney is:

Rodney J. Jacob  
Kathleen V. Fisher  
Daniel M. Benjamin  
Calvo & Clark LLP  
655 South Marine Corp Drive  
Suite 202  
Tamuning, Guam 96913  
(671) 646-9355

I declare under penalty of perjury that the foregoing is true and correct.

DATED: Los Angeles, California, November 15, 2006.

A handwritten signature in black ink, appearing to read 'CHL', is written above a horizontal line.

CHRIS L. HOLM

LA1:#6336666

Christopher E. Chalsen, New York Bar No. 1916485  
(*Seeking Admission Pro Hac Vice*)  
Michael M. Murray, New York Bar No. 2711265  
(*Seeking Admission Pro Hac Vice*)  
Lawrence T. Kass, New York Bar No. 2711265  
(*Seeking Admission Pro Hac Vice*)  
Frank A. Bruno, New York Bar No. 3028032  
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Attorneys for Defendant  
Fujitsu Microelectronics America, Inc.

IN THE UNITED STATES DISTRICT COURT OF GUAM  
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NANYA TECHNOLOGY CORP.,

Plaintiff,

vs.

FUJITSU LIMITED, et al.,

Defendants.

CIVIL CASE NO. 06-CV-00025

**APPLICATION FOR ADMISSION *PRO*  
*HAC VICE OF LAWRENCE T. KASS***

NOW COMES Lawrence T. Kass of the New York, New York firm Milbank, Tweed, Hadley & McCloy LLP and makes application under GR 17.1(d) for admission *pro hac vice*, having been retained by Defendant Fujitsu Microelectronics America, Inc., a California



corporation (“FMA”) to defend its interests in the above-captioned litigation, and would respectfully show unto the Court as follows:

**I.**

Lawrence T. Kass is not a resident of Guam.

**II.**

Lawrence T. Kass is not regularly employed in Guam.

**III.**

Lawrence T. Kass is not regularly engaged in business or other activities in Guam.

**IV.**

Lawrence T. Kass resides at 96 Sun Valley Way, Morris Plains, NJ 07950, and practices as a principal attorney with Milbank, Tweed, Hadley & McCloy, LLP, at 1 Chase Manhattan Plaza, New York, New York 10005. His office telephone number (212) 530-5000 and facsimile number is (212) 530-5219.

**V.**

Lawrence T. Kass was admitted and is an active member in good standing of the bar of the U.S. Supreme Court being admitted on July 31, 2006, the U.S. Court of Appeals for the Federal Circuit being admitted on August 15, 1996, the U.S. District Court for the Southern District of New York being admitted on May 28, 1996, the U.S. District Court for the Eastern District of New York being admitted on June 28, 1996, the U.S. Patent and Trademark Office being admitted on August 4, 1997, and State of New York being admitted in 1996 and an active member in good standing of a United States Court or of the highest court of another State or the District of Columbia.

**VI.**

Lawrence T. Kass is not currently suspended or disbarred in any court, nor has he ever been.

**VII.**

Lawrence T. Kass has been retained by FMA to represent FMA herein.

**VII.**

Lawrence T. Kass has never sought *pro hac vice* admission to this District.

**IX.**

Lawrence T. Kass has designated Rodney J. Jacob, of Calvo & Clark LLP, as local counsel, under GR 17.1(d)(2)(E) and (e). Mr. Jacob is an active member in good standing of the bar of this Court. Mr. Jacob has consented to this designation *infra*.

**X.**

No waiver of any jurisdictional or venue challenge that may be made by FMA is intended by this application.

**XI.**

All facts asserted herein are attested to by Lawrence T. Kass, in the accompanying Declaration.

WHEREFORE, PREMISES CONSIDERED, Lawrence T. Kass, of Milbank, Tweed, Hadley & McCloy LLP, applies for admission *pro hac vice*, to serve as lead counsel for FMA, through and including trial and/or judgment herein.

Dated: November 15, 2006



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CHRISTOPHER E. CHALSEN  
New York Bar No. 1916485  
(Seeking admission *Pro Hac Vice*)  
MICHAEL M. MURRAY  
New York Bar No. 2711265  
(Seeking Admission *Pro Hac Vice*)  
LAWRENCE T. KASS  
New York Bar No. 2711265  
(Seeking Admission *Pro Hac Vice*)  
FRANK A. BRUNO  
New York Bar No. 3028032  
(Seeking Admission *Pro Hac Vice*)  
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Daniel M. Benjamin  
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655 South Marine Corp Drive  
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Tamuning, Guam 96913  
(671) 646-9355

Attorneys for Defendant  
Fujitsu Microelectronics America, Inc.

Christopher E. Chalsen, New York Bar No. 1916485

*(Seeking Admission Pro Hac Vice)*

Michael M. Murray, New York Bar No. 2711265

*(Seeking Admission Pro Hac Vice)*

Lawrence T. Kass, New York Bar No. 2711265

*(Seeking Admission Pro Hac Vice)*

Frank A. Bruno, New York Bar No. 3028032

*(Seeking Admission Pro Hac Vice)*

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New York, New York 10005

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655 South Marine Corp Drive

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(671) 646-9355

Attorneys for Defendant

Fujitsu Microelectronics America, Inc.

IN THE UNITED STATES DISTRICT COURT OF GUAM

FOR THE TERRITORY OF GUAM

NANYA TECHNOLOGY CORP.,

Plaintiff,

vs.

FUJITSU LIMITED, et al.,

Defendants.

CIVIL CASE NO. 06-CV-00025

**DECLARATION OF LAWRENCE T.  
KASS IN SUPPORT OF APPLICATION  
FOR ADMISSION *PRO HAC VICE***

LAWRENCE T. KASS declare under penalty of perjury that the following statements are true and correct:

1. I have personal knowledge of the facts stated in this declaration except as otherwise indicated.

2. I make this declaration in support of my application for admission *pro hac vice* pursuant to GR 17.1(d), having been retained by Defendant Fujitsu Microelectronics America, Inc. ("Fujitsu MA"), to defend its interests in the above-captioned litigation.

3. I am an active member in good standing of the bar of the U.S. Supreme Court being admitted on July 31, 2006, the U.S. Court of Appeals for the Federal Circuit being admitted on August 15, 1996, the U.S. District Court for the Southern District of New York being admitted on May 28, 1996, the U.S. District Court for the Eastern District of New York being admitted on June 28, 1996, the U.S. Patent and Trademark Office being admitted on August 4, 1997, and State of New York being admitted in 1996 and an active member in good standing of a United States Court or of the highest court of another State or the District of Columbia.

4. I am an active member in good standing of a United States Court or of the highest court of another State or the District of Columbia, as indicated above.

5. I agree to abide by the Standards of Professional Conduct, Electronic Case Filing, and to become familiar with the Local Rules and the Alternative Dispute Resolution programs of this Court; and

6. An attorney who is a member of the bar of this Court in good standing and who maintains an office within Guam has been designated co-counsel in the above entitled action. The name, address and telephone number of that attorney is:

Rodney J. Jacob  
Kathleen V. Fisher

Daniel M. Benjamin  
Calvo & Clark LLP  
655 South Marine Corp Drive  
Suite 202  
Tamuning, Guam 96913  
(671) 646-9355

I declare under penalty of perjury that the foregoing is true and correct.

DATED: New York, New York, November 15, 2006.

  
\_\_\_\_\_  
LAWRENCE T. KASS

Christopher E. Chalsen, New York Bar No. 1916485  
(*Seeking Admission Pro Hac Vice*)  
Michael M. Murray, New York Bar No. 2711265  
(*Seeking Admission Pro Hac Vice*)  
Lawrence T. Kass, New York Bar No. 2711265  
(*Seeking Admission Pro Hac Vice*)  
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Attorneys for Defendant  
Fujitsu Microelectronics America, Inc.

IN THE UNITED STATES DISTRICT COURT OF GUAM  
FOR THE TERRITORY OF GUAM

NANYA TECHNOLOGY CORP.,

Plaintiff,

vs.

FUJITSU LIMITED, et al.,

Defendants.

CIVIL CASE NO. 06-CV-00025

**APPLICATION FOR ADMISSION *PRO*  
*HAC VICE OF MICHAEL M. MURRAY***

NOW COMES Michael M. Murray of the New York, New York firm Milbank, Tweed, Hadley & McCloy LLP and makes application under GR 17.1(d) for admission *pro hac vice*, having been retained by Defendant Fujitsu Microelectronics America, Inc., a California

corporation ("FMA") to defend its interests in the above-captioned litigation, and would respectfully show unto the Court as follows:

**I.**

Michael M. Murray is not a resident of Guam.

**II.**

Michael M. Murray is not regularly employed in Guam.

**III.**

Michael M. Murray is not regularly engaged in business or other activities in Guam.

**IV.**

Michael M. Murray resides at 63 Birch Lane, Greenwich, CT 06830, and practices as a principal attorney with Milbank, Tweed, Hadley & McCloy, LLP, at 1 Chase Manhattan Plaza, New York, New York 10005. His office telephone number (212) 530-5000 and facsimile number is (212) 530-5219.

**V.**

Michael M. Murray was admitted and is an active member in good standing of the bar of the Federal Circuit Court of Appeals being admitted on 11/16/90, Eastern District of New York being admitted on 9/10/96, Southern District of New York being admitted on 9/10/96, District of Massachusetts being admitted in 1990, District of Colorado being admitted in 2002, State of New York being admitted on 1/31/96 and State of Massachusetts being admitted on 12/14/88 and an active member in good standing of a United States Court or of the highest court of another State or the District of Columbia.

**VI.**

Michael M. Murray is not currently suspended or disbarred in any court, nor has he ever



been.

**VII.**

Michael M. Murray has been retained by FMA to represent FMA herein.

**VII.**

Michael M. Murray has never sought *pro hac vice* admission to this District.

**IX.**

Michael M. Murray has designated Rodney J. Jacob, of Calvo & Clark LLP, as local counsel, under GR 17.1(d)(2)(E) and (e). Mr. Jacob is an active member in good standing of the bar of this Court. Mr. Jacob has consented to this designation *infra*.

**X.**


No waiver of any jurisdictional or venue challenge that may be made by FMA is intended by this application.

**XI.**

All facts asserted herein are attested to by Michael M. Murray, in the accompanying Declaration.

WHEREFORE, PREMISES CONSIDERED, Michael M. Murray, of Milbank, Tweed, Hadley & McCloy LLP, applies for admission *pro hac vice*, to serve as lead counsel for FMA, through and including trial and/or judgment herein.

Dated: November 15, 2006



CHRISTOPHER E. CHALSEN  
New York Bar No. 1916485  
(Seeking admission *Pro Hac Vice*)  
MICHAEL M. MURRAY  
New York Bar No. 2711265  
(Seeking Admission *Pro Hac Vice*)  
LAWRENCE T. KASS  
New York Bar No. 2711265  
(Seeking Admission *Pro Hac Vice*)  
FRANK A. BRUNO  
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Attorneys for Defendant  
Fujitsu Microelectronics America, Inc.

Christopher E. Chalsen, New York Bar No. 1916485  
(*Seeking Admission Pro Hac Vice*)  
Michael M. Murray, New York Bar No. 2711265  
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Attorneys for Defendant  
Fujitsu Microelectronics America, Inc.

IN THE UNITED STATES DISTRICT COURT OF GUAM  
FOR THE TERRITORY OF GUAM

NANYA TECHNOLOGY CORP.,

Plaintiff,

vs.

FUJITSU LIMITED, et al.,

Defendants.

CIVIL CASE NO. 06-CV-00025

**DECLARATION OF MICHAEL M.  
MURRAY IN SUPPORT OF  
APPLICATION FOR ADMISSION *PRO  
HAC VICE***

MICHAEL M. MURRAY declare under penalty of perjury that the following statements  
are true and correct:

1. I have personal knowledge of the facts stated in this declaration except as otherwise indicated.

2. I make this declaration in support of my application for admission *pro hac vice* pursuant to GR 17.1(d), having been retained by Defendant Fujitsu Microelectronics America, Inc. ("FMA"), to defend its interests in the above-captioned litigation.

3. I am an active member in good standing of the bar of the Federal Circuit Court of Appeals being admitted on 11/16/90, Eastern District of New York being admitted on 9/10/96, Southern District of New York being admitted on 9/10/96, District of Massachusetts being admitted in 1990, District of Colorado being admitted in 2002, State of New York being admitted on 1/31/96, and State of Massachusetts being admitted on 12/14/88.

4. I am an active member in good standing of a United States Court or of the highest court of another State or the District of Columbia, as indicated above.

5. I agree to abide by the Standards of Professional Conduct, Electronic Case Filing, and to become familiar with the Local Rules and the Alternative Dispute Resolution programs of this Court; and

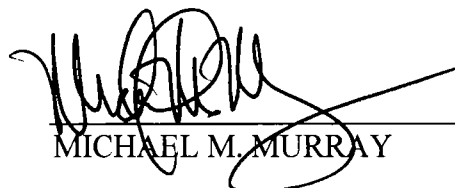
6. An attorney who is a member of the bar of this Court in good standing and who maintains an office within Guam has been designated co-counsel in the above entitled action.

The name, address and telephone number of that attorney is:

Rodney J. Jacob  
Kathleen V. Fisher  
Daniel M. Benjamin  
Calvo & Clark LLP  
655 South Marine Corp Drive  
Suite 202  
Tamuning, Guam 96913  
(671) 646-9355

I declare under penalty of perjury that the foregoing is true and correct.

DATED: New York, New York, November 15, 2006.



A handwritten signature in black ink, appearing to read 'Michael M. Murray', is written over a horizontal line. The signature is stylized with a large, sweeping flourish that extends to the right.

MICHAEL M. MURRAY